

Dylan Dawson

From: Donovan, Caroline <cdonovan@foleyhoag.com>
Sent: Monday, June 29, 2020 4:28 PM
To: Jonathan Bach
Cc: Leonetti, Ken; mtremonte@shertremonte.com; mcuccaro@shertremonte.com; Julian S. Brod
Subject: RE: [EXTERNAL] RE: Gorsoan/Bullock

Jonathan, I can confirm the scope of the search and I'm calling you now to provide wire information and discuss an extension.

Best, Caroline

From: Jonathan Bach <jbach@shapiroarato.com>
Sent: Monday, June 29, 2020 2:36 PM
To: Donovan, Caroline <cdonovan@foleyhoag.com>
Cc: Leonetti, Ken <KSL@foleyhoag.com>; mtremonte@shertremonte.com; mcuccaro@shertremonte.com; Julian S. Brod <jbrod@shapiroarato.com>
Subject: Re: [EXTERNAL] RE: Gorsoan/Bullock

Hi Caroline:

Just wanted to respond to your email below and make sure we are agreed on everything going forward. I never heard from you on the wire information, but I'm around for the next day or so if you want to call or send it to me.

Per your request, assuming we are agreed on everything else, we can add "landmark" to the list of search terms to run through the two collected email accounts.

For purposes of our searches, we plan to use the start date Gorsoan identified in the protocol it proposed to the Court: August 8, 2012.

Can you please confirm, per this entire email chain, that we are now agreed on the scope of the search? Namely that we will use the agreed upon list of terms (as attached to my earlier email), plus "Landmark," to locate potentially responsive documents in the two accounts as collected by Sher Tremonte, with the start date identified above?

Separately, I will need more time, so the sooner you can let me know if your client approves, the better.

Thanks,

Jonathan

Jonathan P. Bach



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From: "Donovan, Caroline" <cdonovan@foleyhoag.com>
Date: Thursday, June 25, 2020 at 4:39 PM
To: Jonathan Bach <jbach@shapiroarato.com>
Cc: "Leonetti, Ken" <KSL@foleyhoag.com>, Michael Tremonte <MTremonte@shertremonte.com>, "mcuccaro@shertremonte.com" <MCuccaro@shertremonte.com>, Julian Brod <jbrod@shapiroarato.com>
Subject: [EXTERNAL] RE: Gorsoan/Bullock

Jonathan, now sending this to your current email.

Best, Caroline

From: Donovan, Caroline
Sent: Thursday, June 25, 2020 4:36 PM
To: 'Bach, Jonathan' <jbach@cooley.com>
Cc: Leonetti, Ken <KSL@foleyhoag.com>; 'mtremonte@shertremonte.com' <mtremonte@shertremonte.com>; 'mcuccaro@shertremonte.com' <mcuccaro@shertremonte.com>; Julian S. Brod <jbrod@shapiroarato.com>
Subject: RE: Gorsoan/Bullock

Jonathan,

Nice to speak with you as well. I can confirm that the attached documents govern as far as the Protective Order. Also, we're agreed that the list of search terms you provided covers the protocol as memorialized in the email of August 5, 2018 (Dkt. No. 55 at 222), subject to the following: The Court had previously ordered that Bullock produce all documents concerning the Landmark Trust (Dkt. No. 44), so could you please ensure that all of those documents are included among the documents searched and produced.

We have inquired of our client about a modest extension (potentially involving a rolling production starting on or before July 15), so I will let you know once I hear back. In the meantime, I will call you tomorrow to provide you with the firm's wire information for payment of the awarded fees and costs.

Best,
Caroline

Caroline S. Donovan | Partner
Pronouns: she, her, hers



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From: Jonathan Bach <jbach@shapiroarato.com>

Sent: Wednesday, June 24, 2020 3:59 PM

To: Donovan, Caroline <cdonovan@foleyhoag.com>

Cc: Michael Tremonte <mtremonte@shertremonte.com>; Mark Cuccaro <MCuccaro@shertremonte.com>; Julian S. Brod <jbrod@shapiroarato.com>

Subject: Gorsoan/Bullock

Caroline:

Good to talk to you this morning. I write to confirm what we agreed upon:

1. The attached protective order, dated December 23, 2016, applies (see two related documents).
2. We will apply the search terms as agreed by email on August 5, 2018, in searching for potentially responsive materials. I have attached a list of those terms for ease of reference. We will apply those search terms to the email accounts janna@jannabullock.com and jannabullock@aol.com as collected by the Sher Tremonte firm on November 17, 2016. Per your request, I have confirmed that Sher Tremonte instructed its forensic vendor at that time to image the full accounts.
3. We do not anticipate asserting a Fifth Amendment privilege.

As we also discussed, I will likely need more time to comply with the judge's order. Among other things, I am flying to Los Angeles on June 30 for an arbitration that is currently scheduled to end July 15. I intend to get the process up and running in the meantime and to move as quickly as possible, but I think it is inevitable we will need more time. Please let me know if you will agree to extend the deadline. Thanks,

Jonathan

Jonathan P. Bach

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